## UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD

Paramedics Plus LLC.	
Employer and	Case No. 32-RC-132094
National Association of Government Employees/SEIU Local 5000	
Petitioner and	
National Emergency Medical Services Association (NEMSA)	
Intervenor and	
United Emergency Medical Services Workers, AFSCME Local 4911, AFL-CIO	
Intervenor	/

## NATIONAL EMERGENCY MEDICAL SERVICES ASSOCIATION'S EXCEPTIONS TO THE HEARING OFFICER'S REPORT ON OBJECTIONS

The National Emergency Medical Services Association ("NEMSA") files this exception to the Hearing Officer's Report On Objections issued on May 15, 2015.

Pursuant to section 102.69 of the board's rules and regulations

A careful examination of the record clearly shows that the hearing officer's conclusions were in error and not based on the factual record and testimony appearing therein, to the contrary, the record and witness testimony, both from

intervenor and petitioner witnesses along with the volumes of exhibits, show the

exact opposite than what the hearing officer concluded and provide substantive

evidence of petitioner NAGE's grievous misconduct. In fact the hearing officer's

report and recommendation itself provides argument that substantiate each of

intervenor NEMSA's objection's, notwithstanding the hearing officer's incorrect

conclusions in her report.

It is this misconduct, as proven in the record, by petitioner NAGE that

destroyed the laboratory conditions requisite under the act for a fair election free

from restraint, coercion, or interference and why the board should not accept the

Hearing Officers Report and recommendation on objections and should further

order the election in the above captioned case be set aside and a new election

conducted.

Dated: May 29, 2015

Respectfully submitted,

Torren Colcord, Executive Director

National Emergency Medical Services Assn.

1211 L. Street

Modesto, CA 95354

## **CERTIFICATE OF SERVICE**

I, Torren Colcord, certify that on May 29, 2015, I e-filed and served via email the National Emergency Medical Services Association's Exceptions to Hearing Officer's Report on Objections for NLRB case 32-RC-132094 to the following persons and email addresses:

Ronald Petrikin, Esq. Conner & Winters, LLP 4000 One Williams Center Tulsa, OK 74172-0148 JPetrikin@cwlaw.com

Manuel Boigues Weinberg, Roger & Rosenfeld MBoigues@unioncounsel.net

Jimmy Gambone UEMSW Local 4911, AFSCME, AFL-CIO P.O. Box 203 Oakley, CA 94561 JGambone@afscme.org

Linda Ledesma-Mouzon NAGE/SEIU Local 5000 1819 Knoll Drive, #7 Ventura, CA 93003 lmouzon@nage.org

/s/Torren Colcord

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Linda Ledesma-Mouzon NAGE/SEIU Local 5000 1819 Knoll Drive, #7 Ventura, CA 93003 lmouzon@nage.org

In addition to the above, on June 1, 2015 I served a copy of the National Emergency Medical Services Association's Exceptions to Hearing Officer's Report on Objections to Region 32 via NLRB e-file

/s/Torren Colcord